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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 RAFEE GLADSON,  
D-2 IBRAHIM KASHMOLA,

Defendants.

Case:5:20-cr-20479

Judge: Levy, Judith E.

MJ: Altman, Kimberly G.

Filed: 10-07-2020 At 01:37 PM

INDI USA V. GLADSON ET AL (DA)

VIOLATIONS:

18 U.S.C. §922(g)(1)

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INDICTMENT

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THE GRAND JURY CHARGES:

**COUNT ONE**

(Felon in Possession of a Firearm

18 U.S.C. § 922(g)(1))

D-1 RAFEE GLADSON  
D-2 IBRAHIM KASHMOLA

On or about September 22, 2020, within the Eastern District of Michigan, RAFEE GLADSON and IBRAHIM KASHMOLA, each knowing that they had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a FEG, model GKK45, .45 caliber pistol, said firearm having travelled in or affected interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO**

(Felon in Possession of Ammunition  
18 U.S.C. § 922(g)(1))

D-1 RAFEE GLADSON

On or about September 22, 2020, within the Eastern District of Michigan, RAFEE GLADSON, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit: six rounds of Remington, .22 caliber ammunition, said ammunition having travelled in or affected interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATIONS**

(18 U.S.C. §924(d) and 28 U.S.C. § 2461(c))

1. The allegations contained in Counts One and Two of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c).

2. Upon conviction of the violations charged in Counts One and Two of this Indictment, defendant, RAFEE GLADSON shall forfeit to the United States any firearm and ammunition involved in the offenses including, but not limited to, a FEG, model GKK45, .45 caliber pistol, and six rounds of Remington, .22 caliber ammunition, pursuant to Title 18, United States Code, Section 924(d)(1) together

with Title 28 United States Code, Section 2461(c).

3. Upon conviction of the violation charged in Count One of this Indictment, defendant, IBRAHIM KASHMOLA shall forfeit to the United States any firearm and ammunition involved in the offense, including but not limited to, a FEG, model GKK45, .45 caliber pistol, pursuant to Title 18 United States Code, Section 924(d)(1) together with Title 28 United States Code, Section 2461(c).

**THIS IS A TRUE BILL.**

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER  
United States Attorney

CRAIG WININGER  
Chief, Violent and Organized Crime Unit

s/ Robert W. VanWert  
ROBERT W. VANWERT  
Assistant United States Attorney  
211 W. Fort St., Suite 2001  
Detroit, MI 48226  
(313) 226-9776  
Robert.vanwert@usdoj.gov  
P70957

Dated: October 7, 2020

United States District Court Eastern District of Michigan	Criminal Case C
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>RV</i>

Case Title: USA v. Rafee Gladson, et. al

County where offense occurred: Wayne

Offense Type: Felony

Indictment – based on prior complaint [Case number 20-MJ-30396]

### Superseding Case Information

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

Reason:

Defendant Name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

October 7, 2020  
 Date

  
 Robert W. VanWert  
 Assistant United States Attorney  
 211 W. Fort Street, Suite 2001  
 Detroit, MI 48226  
 Robert.VanWert@usdoj.gov  
 (313) 226-9776  
 Bar #: P70957

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.